

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN RE:

Gertrude Coretta Fennell Hamilton
aka Gertrude CF Fennell
aka Gertrude Coretta Hamilton
aka Gertrude C Hamilton
aka Gertrude CF Fennell
aka Gertrude C Fennell Hamilton
aka Gertrude Fennell Hamilton
aka Gertrude F Hamilton
aka Trudy Hamilton
aka Trudy F Hamilton
aka Gertrude Hamilton
aka Gertr Fennell Hamilton
aka Gertrude C Fennell
aka Gertrude Fennell

Debtor.

CASE #: 18-04955-eg

CHAPTER 13

JUDGE ELISABETTA GM GASPARINI

RESPONSE TO DEBTOR'S OBJECTION RESPONSE TO CREDITOR (DOC. NO. 141) FILED 11/18/22

COMES NOW U.S. Bank National Association not in its individual capacity but solely as Legal Title Trustee for RMTP Trust, Series 2021 BKM-TT-V, by and through its servicer, Rushmore Loan Management Services, LLC ("Respondent") a creditor in the above-captioned case, by and through counsel, and moves this Court to enter an order overruling Debtor's Objection Response to Creditor (Doc. No. 141) Filed 11/18/22 (Doc. No. 143) filed November 30, 2022 ("Objection") or in the alternative have a hearing on the matter, and respectfully shows this Court as follows:

1. Respondent filed a Notice to Debtor In Response to Entered Order Granting Motion to Incur Debt and Obtain Credit (Doc. No. 138) (Doc. No. 141) on November 18, 2022, providing information concerning the status of the forbearance agreements on the account, payment history, transaction history, reinstatement quote, and payoff.
2. On November 30, 2022, Debtor filed an Objection Response to Creditor (Doc. No. 141) Filed 11/18/22 (Doc. No. 143), alleging fraud, discrimination, and that the reinstatement and payoff are not sufficient.

3. Respondent denies the allegations raised in the Objection and is reviewing said allegations.

WHEREFORE, Respondent prays the Court as follows:

1. Enter an Order Overruling Debtor's Objection Response to Creditor (Doc. No. 141) Filed 11/18/22 (Doc. No. 143) filed November 30, 2022 ("Objection");
2. In the alternative, allow a hearing to be held on the Objection; and
3. Grant Respondent such other and further relief as the Court deems just and proper.

Dated: December 9, 2022

Respectfully submitted,

By: /s/ Anne Marie Throne
Anne Marie Throne
SCBN 13573
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MTG File No.: 22-002283-03

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing in the above captioned case was this day served upon the below named persons by either United States Mail or Electronic Mail at the addresses shown below:

Via U.S. Mail

Gertrude Coretta Fennell Hamilton
99 Elmwood Street
Walterboro, SC 29488

Via E-Mail

Gertrude Coretta Fennell Hamilton, Pro Se

Via CM/ECF electronic service:

James M. Wyman
Chapter 13 Trustee
PO Box 997
Mount Pleasant, SC 29465

US Trustee's Office
Strom Thurmond Federal Building
1835 Assembly Street, Suite 953
Columbia, SC 29201

Dated: December 9, 2022

Respectfully submitted,

By: /s/ Anne Marie Throne
Anne Marie Throne
SCBN 13573

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